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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S  
OPPOSITION TO PLAINTIFFS' MOTION  
TO EXCLUDE EXPERT TESTIMONY**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

Judge: Mag. Lisa J. Cisneros  
Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California  
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber  
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal  
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would  
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the September 19, 2025  
8 Trial Transcript in the JCCP matter.

9 3. Attached as **Exhibit 2** is a true and correct copy of Uber: Trust & Safety Foundational  
10 Wave – U.S., bates stamped UBER-MDL3084-000067582 through 000067633.

11 4. Attached as **Exhibit 3** is a true and correct copy of the June 2017 Uber Trust & Safety  
12 Quant, bates stamped UBER\_JCCP\_MDL\_001102150.

13 5. Attached as **Exhibit 4** is a true and correct copy of the September 25, 2025 Report of David  
14 C. Sawyer.

15 6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the July 23, 2025 Deposition  
16 Transcript of Hassan Turay.

17 7. Attached as **Exhibit 6** is a true and correct copy of the August 29, 2025 JCCP Order on  
18 Parties’ Motions in Limine and Motions to Exclude Expert Opinions.

19 I declare under penalty of perjury under the laws of the United States and the State of California  
20 that the foregoing is true and correct.

21 Executed on December 10, 2025, in San Francisco, California.

22 /s/ Laura Vartain Horn

23 Laura Vartain Horn

**E-FILING ATTESTATION**

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn  
Laura Vartain Horn